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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY -- NEWARK

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Chapter 13

In re:

Chapter 13 Case No. 25-14275-VFP

Geoany Chacon,

Return Date: 7/17/25
Time: 8:30 a.m.

Debtor

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**ATTORNEY'S RESPONSE TO MORTGAGEE'S OBJECTION TO THE CONFIRMATION
OF THE DEBTOR'S CHAPTER 13 PLAN**

I, Nicholas Fitzgerald, the above named debtor's counsel, hereby responds to the mortgagee's objection to the confirmation of the debtor's proposed Chapter 13 payment plan as follows:

The objection to confirmation is that the debtor is \$20,883.18 behind on his pre-petition mortgage payments. We do not dispute the amount of the pre-petition arrears nor do we dispute the debtor's obligation to resolve the issue of his pre-petition mortgage arrears.

The debtor is presently one month into a trial loan modification and if the loan modification is approved by the debtor's mortgagee and approved by the Bankruptcy Court, then the mortgage arrears would not have to be paid through the debtor's payment plan.

If for whatever reason the mortgage loan modification is not approved, then the mortgage arrears will have to be paid through the debtor's Chapter 13 payment plan.

Dated: May 19, 2025



Nicholas Fitzgerald
Debtor's Counsel